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ABSTRACT

Comments from program directors, Indian contractors, and tribal leaders are considered in the report of the Bureau of Indian Affairs' (B.I.A.) Indian Action Team Program, implemented in 1972 to provide Indian people living on reservations with job training through Indian Technical Assistance Center contracts with tribal groups. Funding was $66.2 million to 1977, when there were 63 contracts. The B.I.A., through its Indian Technical Assistance Center, needs to determine the effectiveness of the training program by establishing evaluation measurements and then modifying the Indian contracts to reflect the measurement criteria and reporting requirements. The Center should evaluate the contractors' performance to determine which programs should not continue to be funded. Proposed programs should be evaluated and the best ones funded when money becomes available. In addition, the B.I.A. should assist tribes in their training efforts by reviewing all Indian Action Team Program contracts with Indian contractors to determine the need for technical assistance and then providing it. Benefits to the tribes from the program include job training, substantial improvements to various Indian facilities, and increased pride. (SB)

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REPORT OF THE COMPTROLLER GENERAL OF THE UNITED STATES

The Bureau Of Indian Affairs Needs To Determine How Well Its Indian Training Program Is Working And Assist Tribes In Their Training Efforts

After 5 years of contracting with tribal groups to train Indian people on reservations for employment, the Bureau of Indian Affairs still lacks written criteria to determine results of its Indian training program (Indian Action Team program). Until such criteria are established, no overall evaluation of the program's effectiveness can be made.

Presently, only limited documentation is available at the Indian contractors. However, the program appears to be having an impact by providing capital improvements on the reservations, and tribal leaders advised that the program was bringing pride to the Indians who learn a useful trade.

The Bureau needs to develop criteria to evaluate the performance of the program and identify and provide needed technical assistance to the tribes.

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CED-78-46

FEBRUARY 13, 1978

COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-114868

The Honorable Robert C. Byrd, Chairman
Subcommittee on the Department of
Interior and Related Agencies
Committee on Appropriations
United States Senate

Dear Mr. Chairman:

This is one of a series of reports in response to your request of August 9, 1977, asking us to make a comprehensive review of the Bureau of Indian Affairs programs and processes. This report presents the results of our evaluation of the Bureau's Indian Action Team program--a program designed to train Indian people living on reservations for employment--and points out that the Bureau still lacks written criteria to measure program results.

As requested by your office, we have not obtained written agency comments. However, we have informally discussed our findings with agency officials.

As arranged with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 10 days from the date of the report. At that time, we will send copies to interested parties and make copies available to others upon request.

Sincerely yours,

Comptroller General
of the United States

COMPTROLLER GENERAL'S REPORT TO THE SUBCOMMITTEE ON THE DEPARTMENT OF INTERIOR AND RELATED AGENCIES, SENATE COMMITTEE ON APPROPRIATIONS

THE BUREAU OF INDIAN AFFAIRS NEEDS TO DETERMINE HOW WELL ITS INDIAN TRAINING PROGRAM IS WORKING AND ASSIST TRIBES IN THEIR TRAINING EFFORTS

D I G E S T

The Bureau of Indian Affairs does not have a system for determining the effectiveness of its Indian Action Team program--a program to train Indians living on reservations for employment. (See p. 3.) Moreover, the Bureau does not require appropriate recordkeeping from the Indian contractors so that the program impact can be assessed. (See p. 4.)

GAO visited 10 of the 63 fiscal year 1977 Indian contractors, but was unable to determine overall trainee employment success or failure rates because of inadequate records. (See pp. 9 to 10.)

However, through discussions with program directors, three of the contractors visited identified employment success rates for 45, 48, and 53 percent of their former trainees. Two contractors could identify employment success rates for only 6 and 13 percent, although in the latter cases the employment status for over 80 percent of the former trainees was unknown. (See p. 13.)

Some program directors told GAO that the Bureau had provided little technical assistance so that their training programs initially were run by "trial and error." In one case, training efforts were combined with another federally funded training program for the first few years, and the program director reported that he had very little control over the training given. (See pp. 15 and 17.)

Some program directors reported that they were having difficulty obtaining or holding on to qualified training instructors, due mainly to the low wage scale provided. (See p. 17.)

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The program offers benefits other than just training Indians for employment. Through on-the-job training projects, for example, millions of dollars in capital improvements have been made to tribal and individual Indian facilities. Projects ranging from minor plumbing and electrical repairs to larger building construction have been completed. (See p. 14.)

Tribal leaders told GAO that an important benefit to the Indian people was pride--pride in learning a useful trade and working on projects for other Indian people. (See p. 17.)

In 1970 the Commissioner of the Bureau of Indian Affairs directed that a new approach to provide training for Indian people be developed consistent with the President's goal of Indian self-determination. This led to the creation of the Indian Action Team program whereby the Bureau, through its Indian Technical Assistance Center, contracts with tribal groups to provide marketable training skills--such as construction, heavy equipment, and administrative skills--to Indian people living on reservations. (See pp. 1 to 2.)

The program grew from an $800,000 pilot program with three contracts in 1972 to a $20.4 million program with 63 contracts during fiscal year 1977. Total cost of the program through that period was $66.2 million. In fiscal year 1978, an additional $21.3 million has been funded, making the total funding to date $87.5 million. (See p. 2.)

The program has operated for over 5 years, but the Center does not have sufficient staff to evaluate the program or to provide proper technical assistance to the Indian contractors. (See p. 3.)

The Bureau has continued to award contracts to the same Indian contractors each year without determining whether their programs are effective. It has proposals totaling $16.4 million which it cannot fund. As long as the funding level remains the same and

the Bureau continues to fund the same contractors year after year, none of the new, promising proposals can be funded unless a system is established to evaluate the training program effectiveness and to identify those contracts which should not be renegotiated. (See p. 7.)

As early as 1975, the Department of the Interior's Office of Audit and Investigation reported that the Bureau has not developed methods to measure what the program had accomplished. This was substantiated again in 1977 in a Bureau management review team report which recommended that the Center should be reorganized, that qualified staff should be acquired, and that clear operating procedures should be established. Plans are currently underway to implement the management review team's recommendations, and the Bureau has drafted an operations manual for the Center which establishes, among other things, a planning, monitoring, and evaluation section and a technical assistance branch. (See pp. 5 to 9.)

RECOMMENDATIONS TO THE SECRETARY OF THE INTERIOR

The Secretary of the Interior should direct the Assistant Secretary for Indian Affairs to carry out the recommendations of the Bureau's management review team and to make every effort to reorganize the Indian Technical Assistance Center in the manner outlined in the Bureau's draft operating manual. The Assistant Secretary should then instruct the Chief of the Center to:

--Establish, with the Indian contractors, measurements to evaluate the effectiveness of the Indian Action Team program.

--Modify the Indian contracts to reflect the measurement criteria established and the reporting requirements.

--Require that Indian contractors submit necessary reports to the Center for evaluation purposes.

--Evaluate the Indian contractors' performance as soon as possible to identify those programs for which further contracts should not be negotiated.

--Evaluate proposed Indian Action Team programs and fund the most promising ones if, as a result of the contractor evaluations, funds become available.

--Review all Indian Action Team program contracts with the Indian contractors to determine if technical assistance may be needed and to provide such assistance. (See pp. 19 to 20.)

FORMAL REVIEW AND COMMENTS NOT OBTAINED

At the request of the Chairman, Subcommittee on the Department of Interior and Related Agencies, Senate Committee on Appropriations, GAO did not submit this report to the Department of the Interior for formal review and comments. However, responsible agency officials were provided copies of the report and their informal comments have been considered.

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ABBREVIATIONS

BIA	Bureau of Indian Affairs
GAO	General Accounting Office
ITAC	Indian Technical Assistance Center

CHAPTER 1

INTRODUCTION

On August 9, 1977, the Chairman, Subcommittee on the Department of Interior and Related Agencies, Senate Committee on Appropriations, requested that we make a comprehensive review of the Bureau of Indian Affairs (BIA), Department of the Interior, programs and processes and report the results to him by February 15, 1978. This is one of a series of reports in response to that request. This report presents the results of our evaluation of BIA's Indian Action Team program--a program designed to train Indian people living on reservations for employment.

INDIAN ACTION TEAM PROGRAM

The Indian Action Team program resulted from a request of the Commissioner of BIA. In 1970 the Commissioner directed that a new approach to provide training for Indian people be developed which was consistent with the President's July 1970 message to the Congress calling for Indian self-determination without termination. This new policy was offered as an alternative to the past Federal policy of terminating responsibility and services to Indian tribes as promptly as possible.

The Commissioner provided the following guidelines for establishing a new training program:

1. Provide training to Indians living on reservations requiring no relocation of trainees or their families.

2. Provide knowledge and marketable skills to Indians for long-term employment on or near reservations.

3. Provide a means by which the Indian people can acquire the knowledge and skills they want.

4. Coordinate the training program with tribal comprehensive planning.

5. Fund training programs that are economically feasible.

6. Fund training programs that help establish Indian businesses.

To test the program, BIA awarded contracts totaling $800,000 to three Indian contractors in 1972. The program was later expanded, and during fiscal year 1977, contracts totaling $20.4 million were awarded to 63 Indian contractors. Total cost of the program through fiscal year 1977 was $66.2 million. For fiscal year 1978, $21.3 million has been funded for the program, bringing its total cost from inception through fiscal year 1978 to $87.5 million.

The training program is run by BIA's Indian Technical Assistance Center (ITAC) in Lakewood, Colorado. In keeping with the goal of Indian self-determination and total Indian involvement, ITAC contracts with tribal groups to provide training to Indian people. Training elements vary according to the established goals or objectives of each tribe. ITAC's fiscal year 1977 statistics show that 192 separate training elements were being conducted by the contractors, with 1,563 trainee slots available. Construction trades (carpenters, electricians, masons, painters, plumbers, etc.) represented about one-half of the training effort, followed by heavy equipment operations and administrative/management operations.

The original program concept called for the training of Indian people to be accomplished in three phases--classroom, shop application, and project work (on-the-job training). Now, in an effort to be more responsive to the short-term needs of their people, many contractors are primarily concerned with project work only. ITAC officials say that in the future greater emphasis will be placed on economic and human resource development and tribal government development.

SCOPE OF REVIEW

We examined records at ITAC to assess program results, attended the Indian Action Program National Conference in Denver, Colorado, to meet with various Indian officials and program directors to obtain their views on the program, and visited 10 Indian contractor locations in Nevada, Arizona, New Mexico, Oklahoma, and North Carolina to document information on individual program accomplishments. We discussed various aspects of the program with tribal officials, program participants, and BIA officials at ITAC and in Washington, D.C.

At the conclusion of our work, we provided copies of our report to responsible Department of the Interior officials, and their oral comments have been considered.

CHAPTER 2

LACK OF BIA GUIDANCE AND ITAC STAFFING PROBLEMS ARE HAMPERING PROGRAM EFFECTIVENESS

BIA, through its ITAC staff, is responsible for monitoring the overall accomplishments of the Indian Action Team program. However, the lack of BIA guidance and ITAC staffing problems have prevented ITAC from establishing a program monitoring and evaluation system and providing adequate technical assistance to Indian contractors. As a result, ITAC does not know which contractors are successful, which ones need technical assistance, and which ones should not be renegotiated. Without such information, ITAC is unable to consider funding more promising contract proposals.

The program is very popular with the Indian tribal groups and has provided many benefits. However, no detailed or uniform information exists at the contractor locations to determine the extent of these benefits.

LACK OF BIA GUIDANCE TO EVALUATE PROGRAM

BIA has not established written criteria to measure program results; therefore, no meaningful overall evaluation has ever been done. BIA issued general program guidelines in December 1974 but did not specify how program evaluations would be made. A corresponding BIA brochure did, however, provide the following section on program monitoring:

> "In order to facilitate monitoring of all on-going IAT (Indian Action Team) Programs, the Tribal Group, who is the legal Contractor, will submit timely reports, as outlined in the Contract, to the Chief, Indian Technical Assistance Center. The following reports are required of all Tribal Groups participating in the Indian Action Team Programs:
>
> 1. MONTHLY PROGRESS REPORTS: List of each activity showing achievements, and/or problems and whether training is proceeding as scheduled. This report is due as directed by the Contracting Officer.

2. MONTHLY ENROLLMENT REPORT: At the end of each month of operation the Contractor shall submit an enrollment roster which identifies all trainees currently enrolled by name, age, training specialty, address and number of dependents. If a student drops out or is expelled, the reasons therefore should be provided. The final report should identify the trainee's future employer, or present employer if employed from any Indian Action Training Program.

3. ATTENDANCE REPORT: A monthly report of attendance shall be submitted which identifies by subject matter the classes held (includes shop and on-the-job training), hours of instruction and number of trainees attending each class each day.

4. OTHER: Necessary and periodic reports of a special nature which may be required to support and justify the Program.

5. PROJECT COMPLETION REPORT: Upon completion of the Program, the Tribal Group (Contractor) will make a complete evaluation and summary of their program at the location. This report should include topics covered in monthly reports and should give a final evaluation of the program effectiveness and staff capabilities."

In October 1976 ITAC modified all program contracts so that its contractors were no longer required to submit monthly progress, personnel, and project information reports, thereby eliminating the data needed for measuring program effectiveness. According to an ITAC official, this was done because adequate staff was not available to evaluate the program. ITAC maintained a requirement for monthly disbursement reports as well as quarterly and annual reporting from each contractor. According to the contract terms, the annual reports should include "* * * information on the conduct of the program or services and the extent to which the goals and objectives of the tribe were accomplished."

We found that the accomplishment statements made by the contractors in their reports to ITAC were generally too vague to be used for measuring the training program's effectiveness. For example, some reports stated that the program had trained a number of Indian people for employment, yet

would not identify the type of employment obtained or how the employment related to the training given.

Internal audit report cites the lack of available information for program evaluation

On November 17, 1975, the Director of Audit and Investigation, Department of the Interior, issued an internal audit report on the Indian Action Team program. The report covered a detailed review of six fiscal year 1974 contracts. The primary purpose of the review was to measure, in quantifiable terms, what the program was accomplishing, such as number of people trained, number of people getting jobs related to their training, and value added to reservation facilities.

The report stated that BIA had not developed methods to measure what the program was accomplishing and, except for the training objectives, that accumulating data on program effectiveness was not possible--either because no information was available or because no quantifiable measurements were established for the program objectives.

The report further stated that no basic judgments on the program's merits could be made because there were no tangible performance criteria with which to compare them. Although the report recognized that the program had contributed substantially in adding value to reservation facilities by using trainee labor on construction projects, the information available was not sufficient to estimate that contribution.

The internal audit report recommended, among other things, that the Indian contracts should provide for formalized measurement of trainee achievement and other program accomplishments, such as measuring the value added to reservation facilities.

In responding to the draft audit report, the Chief, ITAC, stated that ITAC had established a reporting system and would now be able to monitor retention rates, job placement, project activities, and other definable program statistics in a more meaningful manner. The Acting Deputy Commissioner responded to the report in January 1976 by stating that special evaluation teams composed of Central Office personnel would be formed to make onsite visits and to review the overall effectiveness of the program as a whole and individually by contractor. According to an ITAC official, however, no overall evaluation of program accomplishments has been made.

Management review team also hampered by lack of written criteria to evaluate program effectiveness

In November 1976 the Director of BIA's Office of Administration sent a memorandum to the Acting Deputy Commissioner that outlined several concerns and problems that were expressed to him by various Indian contractors regarding the lack of qualified ITAC staff and BIA's neglect of the program. The Director called for the immediate establishment of a management review team to determine the overall effectiveness of ITAC operations.

On December 6, 1976, a management review team was appointed by the Acting Deputy Commissioner to conduct a comprehensive study of all operational aspects of the Indian Action Team program and the management of ITAC.

The general findings of the management review team report, issued on February 23, 1977, substantiated the criticism made in the earlier audit report; namely, that there was still a total absence of written criteria on which to evaluate the program. The management review team pointed out that, without such written criteria, only the contractor's subjective evaluation of the program was available, and the question of accountability to the Congress was very real indeed. The team recommended that specific tasks be accomplished to correct the situation, including among other things:

1. Develop specific program objectives.

2. Develop program guidelines and appropriate contract performance measures.

3. Prescribe, in writing, a clear set of internal operating procedures for ITAC.

These tasks are currently being worked on by ITAC staff, as discussed later.

Information needed to evaluate program accomplishments is still not available at ITAC

In October 1977 we reviewed each of the active ITAC contract files to obtain information for evaluating the overall acomplishments of the program. The ITAC files did

not contain adequate, or uniform, information for making such an overall evaluation, and therefore it was impossible to determine whether individual contract performances had succeeded or failed to reach their training goals.

During our review, we noted that about $16.4 million in contract proposals had been received by ITAC yet could not be approved due to lack of available funds. Several of the proposals had been on file for a number of years. As long as the funding level for this program remains the same, and ITAC continues to fund the same contractors year after year without evaluating individual performance to identify contracts that should not be renegotiated, these and future proposals will continue to be inactive. For this reason alone, an effective evaluation system is needed.

We discussed the situation with ITAC officials and were told that the reason no attempt had been made to accumulate uniform information on individual program accomplishments was due mainly to the lack of available ITAC staff and the lack of permanent leadership and direction to ITAC from BIA. These points are discussed in the following section.

ITAC STAFFING PROBLEMS

In the BIA management review team report previously mentioned, the following problems, among others, were identified regarding ITAC staffing:

--The existing organization of ITAC is not effective. Duties have been assigned to various individuals on an informal basis, resulting in criss-crossed lines of authority, lack of leadership, and confusion of roles.

--ITAC is carrying nine temporary employees, many of whom have had continuous service of 2 or 3 years. The lack of established policy for conversion to permanent positions has caused confusion and lack of incentives for the temporary employees, which in turn has caused poor attitudes, poor attendance, and listless approach to the work.

--BIA has given ITAC little direction on either policy guidance or operational concerns. Evidence that significant disciplinary problems existed at ITAC were either ignored or given

cursory discussion, but no meaningful attempt to rectify the situation was offered.

The management review team felt that the program needed more attention from BIA officials in Washington. Therefore, the team recommended in its report that the direction of the program and ITAC be removed from the Chief, Division of Job Placement and Training, Office of Tribal Resources Development, and placed directly in the Office of the Commissioner (now Assistant Secretary for Indian Affairs).

The team recognized that its recommendation might be considered a drastic move. However, it stated that considering the fact that the same major problems were discussed in the 1975 audit report and the situation has not progressed but rather deteriorated, the consequence of leaving matters as they are is equally drastic.

When we reviewed ITAC in October 1977, we found that the staffing problem was still acute, and the staff currently available was inadequate to perform program evaluations or give needed technical assistance to Indian contractors. Of the 28 full-time permanent positions authorized, only 11 were filled. In addition, 10 temporary positions were filled. All of the filled positions were for contract specialists, architects, engineering technicians, construction inspector, and administrative support staff (includes program officer and accountant). There were no program analyst positions filled to monitor and evaluate the program although five vacant positions were being carried on the permanent position roster. Also, the few available contract specialists have been unable to visit contractors on a regular basis to identify problem areas or to arrange for technical assistance in a timely manner. These staffing problems have continued to hamper the overall administration and effectiveness of the program.

BIA is currently in the process of reorganizing ITAC in a manner similar to that recommended by the management review team. Although ITAC is still within the Office of Tribal Resources Development, it has been elevated one level closer to the newly established Assistant Secretary for Indian Affairs Office by removing it from the Division of Job Placement and Training and placing it directly under the Director, Tribal Resources Development.

An ITAC Operations Manual was developed by the ITAC staff in September 1977 and has been submitted for BIA approval. The manual outlines the ITAC mission and provides detailed functions for various branches within

ITAC, such as planning, monitoring and evaluation, and technical assistance. A planning, monitoring and evaluation process has been outlined, which, in part, includes:

--developing a needs assessment method to determine what will satisfy the particular needs of each Indian contractor,

--establishing program-monitoring and evaluation procedures concurrent with the needs assessment,

--designing overall evaluation program management procedures with ITAC,

--implementing an evaluation program and synchronizing it to established ITAC and Indian contractor milestones.

The Civil Service Commission recently completed a classification of ITAC's staffing positions so that ITAC could begin modifying its organization and advertising for new positions. As a result of the classification, 6 permanent positions were filled with current ITAC employees and 18 additional permanent positions were advertised competitively under Indian preference requirements. The latter positions were to be filled in mid-December, however, as of January 3, 1978, selections had not been made.

We were informed by a BIA official that the announcement for the ITAC Chief would be made shortly so that the position could be filled by February 1978 when the Acting Chief's 120-day temporary status expires. Also, the official said that in order to comply with a recommended ITAC staffing level of 31 permanent positions, 6 additional announcements are pending but must first be approved by BIA. We noted that one of the pending positions is for a program analyst, whose function would be to monitor and evaluate the Indian Action Team program and assure that attention and technical assistance is directed to possible problem areas. If this position is not filled we believe these functions will remain as they have been in the past.

INFORMATION ON PROGRAM ACCOMPLISHMENTS IS LIMITED

During October and November 1977, we visited 10 of the 63 fiscal year 1977 Indian contractors, all of which are to continue participating in the fiscal year 1978 program. These contractors, as previously mentioned, are located in Nevada (two), Arizona (two), New Mexico (three), Oklahoma (two), and North Carolina (one).

The purpose of our visits was to obtain documented information, if possible, on (1) current and former trainees of the program and (2) individual project work done as a result of the training, in order to quantifiably measure program accomplishments through those two areas. In addition, we wanted to discuss the benefits and problems of the program with tribal officials, trainees, and other Indian participants, so that we could report on the program's overall effect on the Indian people.

Total funding for the 10 contractors visited, through fiscal year 1977, was about $12.3 million and ranged by contract from about $650,000 to $2.6 million. The contract inception dates varied from July 1972 to September 1975.

Because BIA, through ITAC, has not required the contractors to develop measures for evaluating program accomplishments, no detailed or uniform information existed at the contractor locations. Even when the contractors' annual funding proposals to ITAC and subsequently approved contracts stated specifically what would be accomplished during the training periods, we could find no evidence showing that any attempts have ever been made to compare proposed with actual performance. Therefore, we could not determine the extent of success or failure of each contractor's program.

We were able to obtain certain trainee and project information from each contractor visited, although the degree of detail depended on the sophistication of the program director's recordkeeping and on the program reporting requirements of each tribe. The information was not complete due mainly to the lack of available records, and we were not able to verify its accuracy. Therefore, an overall evaluation of the program's effectiveness would be difficult, if not impossible, until such time as uniform or measurable reporting requirements are established and followed by BIA and the contractors.

The following portions of this chapter address the trainee and project statistics obtained from the 10 contractors we visited. We also include other information related to specific training programs, identify numerous problems encountered by the contractors in their attempt to make this training program a successful step toward Indian self-determination, and discuss intangible benefits of the program as perceived by the Indian people we interviewed.

Current trainee information

At the time of our visits to the Indian contractor locations, one of the training programs was not currently operating because fiscal year 1977 funds had been depleted, and one program was marginally operating using its remaining fiscal year 1977 funds. In these two programs, fiscal year 1978 funds either had not yet been approved by ITAC or had not been received by the contractor. We analyzed contractor records for the eight totally active training programs and found that:

1. There were 207 current trainees participating in 33 training elements with an average of 26 trainees for each contractor.

2. At least 119 of the current trainees (57.5 percent) were enrolled in the construction trades training element. The remaining 88 current trainees were enrolled in heavy equipment operations, facilities and utilities maintenance, mechanics, tribal operations/administration, health-related operations, agriculture/ranch management, surveying, food service, bus driving, or tribal enterprise development.

3. The average length of stay for the current trainees was 10.7 months, ranging from 1 week to 56 months.

The training curriculum at each contractor varied according to the specific desires of the tribal groups. In some instances, contractors set training courses to provide classroom and project instruction for definite time periods, such as 12 or 18 months, with classroom training constituting one-third or one-fourth of the program. In other instances, contractors did not define specific course standards and the program had become primarily project oriented, with very little classroom instruction.

At least one of the contractors had classroom instruction given by a local community college. In this case, the contractor had reached some type of agreement with a local college to teach specific courses to trainees for at least 2 years before its ITAC contract was modified to allow for such training expenditures. According to an ITAC report the program director stated that the college training costs during that 2-year period were charged to program supplies; however, no records were available to verify the costs.

Another contractor was about to enter into an agreement with a vocational school to provide a specific element of training while another had just initiated efforts to start a State-approved apprenticeship program, with the training to be provided by its tribally owned enterprise. These programs had not been finalized at the time of our visits.

Due to limited time, we were unable to review the types of training being conducted to determine if particular needs of the Indian people were being addressed. Because the program is aimed at Indian self-determination, we can only assume that the training identified by the tribal groups meets the primary needs of the people. However, we do believe that ITAC should more actively assist the contractors to establish accomplishment measurements while training courses are being designed so that they can be properly monitored and evaluated.

Former trainee information

From the 10 contractors visited, we identified a total of 694 former trainees, ranging by contractor from 16 to 121 trainees. The training periods covered by the former trainees varied; some contractors' files included trainee information from program inception, while others could identify trainees only during the last fiscal year.

Although the trainee records we examined generally allowed for the collection of prior and subsequent employment information, in many cases those sections were not filled in by the trainees or the program director. In other cases, the records show that a trainee had quit the program to seek other employment but would either not show if the trainee had actually received employment or whether such employment, if obtained, was training-related. Problems such as these have been identified continually in ITAC trip reports, yet very little corrective action has been taken by ITAC or the contractors to improve the trainee records. Some of the program officials we spoke with agreed that detailed employment information would be beneficial in measuring program accomplishments. However, one program official stated that at present he sees no way of obtaining such information as he does not have the time or staff to follow up on former trainees' employment status.

At the time of our visits, we were able to establish the following statistics for the 694 former trainees:

Current status	Number of trainees	Percent of total trainees
Employed (training-related)	123	18
Employed (not necessarily training-related)	90	13
Entered other Federal training programs	3	-
Entered school	35	5
Entered military services	5	1
Deceased	4	1
Unemployed	22	3
Unknown	412	59
	694	100

In many of the former trainee cases, the individual periods of training were so short--maybe 1 month or less--that it seemed unlikely that the program could have had any effect on those trainees' future employment potential.

Contractor records showed that often a trainee would leave the program for lack of interest or move off the reservation, and no followup action was taken by the contractor. Because of situations like these, the current employment status of 412 of the 694 former trainees had to be recorded as "unknown" which limits the use of the statistics in determining the overall effectiveness of the program.

An analysis of individual contractor records indicated that, in three cases, employment (training-related or not) of former trainees was 45, 48, and 53 percent of the total trainees who entered the program. On the other hand, two contractors could only identify 6 and 13 percent employment for former trainees; however, over 80 percent of their trainees' employment status was unknown. BIA has never determined an employment success or failure rate for the program, so we had no measurement with which to compare our statistics.

The opportunities for employment differ vastly among the contractors. For example, in one case a tribal official stated that his government employs about 275 people; therefore, most of the trainees will obtain employment with the tribe after acquiring the necessary training skills through the program. At other locations, employment on or near the reservation was limited, causing trainees upon program completion to either seek employment elsewhere or remain unemployed on the reservation. Some trainees we interviewed stated that it was physically impossible for them to leave the reservation due to family responsibilities; thus, they may have no choice other than unemployment once they complete their training unless local employment opportunities improve.

Project information

In the Department of the Interior's fiscal year 1977 Senate Appropriations Committee hearings, it was stated that the Indian Action Team program has resulted in capital improvements to tribal and individual Indian facilities of about $18 million. ITAC officials have since estimated that capital improvements are worth many times that amount--the latest figure is $72 million.

We could find no documentation at ITAC to substantiate any of the amounts claimed, nor could we obtain a complete listing of program-resulting capital improvements at all of the locations visited. We did, however, identify over 200 completed and ongoing projects at the contractors, which resulted in about $1.3 million being added to the capital improvements of the Indian people in those areas. Because the contractors have not kept complete cost records by project, we had to obtain this information from various sources, including discussions with program directors, tribal leaders, and project participants. For lack of information, many projects and their related costs were not included in our analysis.

The projects we examined varied considerably, generally depending on the priorities set by the tribal groups. Some trainees were directed to handle only small projects, such as installation of wiring or plumbing in an individual home, while other trainees took on major projects, such as the construction of tribal buildings.

Many projects we examined can be viewed as successful program completions. For example, at one contractor location, a house was constructed entirely by trainees, using about $6,700 in program labor, equipment, and supplies.

This endeavor, when coupled with about $11,000 in materials provided jointly by the landowner and BIA's Housing Improvement Program, resulted in a completed project with an estimated market value of $33,000. (See photo 1, p. 16.) Also, at another contractor location, restroom facilities were constructed at a tribally owned campground, using about $4,000 in labor provided by the training program and about $1,500 in materials provided by the Economic Development Administration.

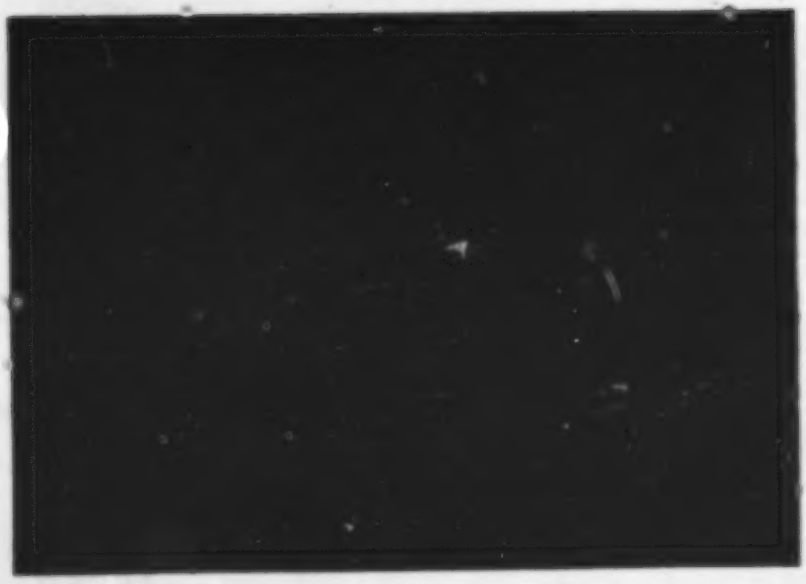
On the other hand, at the time of our visits some projects appeared to be having problems. For example, one contractor had spent most of his recent construction trainee effort in building a two-story office complex for the tribal government. During 1977 over $59,000 in labor and material had been provided by the training program; however, the construction instructor recently quit and supply funds ran out, leaving the project and the trainee program in limbo. (See photo 2, p. 16.) According to a program official, the remaining work on the building, which is substantial, could require the hiring of a consultant if a qualified instructor replacement is not found soon. In another case, a tribal contract to provide rock material and masonry trainee labor for a federally funded housing project never materialized. As a result, eight trainees became discouraged and quit the program, making that training element inactive until a new group of trainees could be selected.

Problems encountered by contractors and program directors

Several of the program directors we interviewed stated that very little technical or contract assistance has been provided by ITAC and, as a result, their programs were initially run by "trial and error." In one case, we found that due to lack of ITAC assistance in establishing a sound training program, the program operated under the control of a Department of Labor training program director for the first couple of years. According to the Indian Action Team director, the Labor program director had provided the input for the training program, using about a dozen training elements which were part of his ongoing Labor program. As a result, ITAC provided funding for training instructors and materials, while the Labor program provided funding for the trainees. During the first few years, the Indian Action Team program director had very little control over the training given. According to the program director, it was some time before he was able

PHOTO 1

PHOTO 2



to work with the ITAC staff to have his training elements reduced to a reasonable number and his program separated from the Labor program.

Some contractors are having difficulty obtaining or holding on to qualified training instructors, as required by the ITAC contract. According to program directors, this is due mainly to the low wage scale allowed by ITAC and the tribal governments. During one of our visits we noticed that some training instruction was being given by "advanced trainees" who were not qualified instructors. Although ITAC has recognized this deficiency in its trip reports to various contractors, the problem still exists to some degree.

A number of contracts we reviewed at ITAC stated that the objective of the program was to train people for employment in tribal enterprises. We noted that many of the tribal enterprises had either not been established or, if established, were having operational difficulties. One contractor's training program was originally controlled by a tribal enterprise which went out of business due to mismanagement. The training program was left with financial problems of the enterprise which are still not totally resolved. The direction given by the Commissioner of BIA in 1970 when this program was under development emphasized the establishment of Indian businesses. We believe such emphasis is essential to the success of the program. In discussing this aspect with tribal leaders and program directors, we were told that additional funding sources and technical assistance were needed before many of the tribal enterprises could become self-sufficient. In our opinion, BIA and ITAC could play an important role in helping to alleviate this problem by being properly staffed to identify the enterprise needs and providing the required technical assistance.

Intangible benefits of the program

At the contractor locations visited, we met with as many tribal officials and program participants as possible to get their views on the intangible benefits of the program.

We were told on numerous occasions that one of the major benefits of the program to the Indian people was pride--pride in learning a useful trade and in doing work for other Indian people. Also, program directors took pride in the fact that a number of former trainees have

returned to school after entering the program. Several tribal officials stated that another major benefit or accomplishment of the program was getting the trainees to understand the importance of working an "8-hour day." According to these officials, many of the trainees had never had a full time job, had never completed high school, or had never been trained in any skills, so getting them enrolled in a training program of this nature was quite an accomplishment.

The trainees, too, perceived the program as having many benefits--mainly because it provided them a livelihood (training allowance) while they were learning a skill. Because some of the trainees we interviewed felt it was necessary for them to remain on the reservation, they said the program was the only way of improving their employment opportunities there.

We were told by tribal councils and program directors that many of the members of the Indian community could not afford to have necessary repair work done on their homes; however, through this program the tribe was able to provide trainee labor and materials in some cases to do the work for them. The benefits of such work are twofold: the trainee receives added training and the recipient's standard of living is improved.

CONCLUSIONS

Although the Indian Action Team program has existed since 1972, BIA, through its ITAC staff, has no written criteria on which to evaluate the program's effectiveness.

ITAC has not required the Indian contractors to uniformly collect or submit program accomplishment information. As a result, detailed training and project information is not available in the contractors' files, and can only partially be obtained through discussions with tribal officials and/or program directors.

At 3 of the 10 contractor locations we visited, the records indicated that about one-half of the former program trainees were subsequently employed although not always in a training-related area. Other contractor statistics indicated much less employment success, however, in most cases, records were too incomplete to make any accurate judgment of the program's effectiveness. In all locations visited, we were able to record some measurement of training accomplishments by inspecting or discussing various projects. However, because ITAC does not require

that detailed project records be kept, many costs were not included in our analysis. Intangible benefits--such as pride in learning a useful trade and improving the Indian's standard of living--were also discussed with Indian leaders and participants.

ITAC has provided little technical assistance to the contractors in the past, causing some programs to run by trial-and-error the first few years.

At the time of our review, ITAC was inadequately staffed to even attempt to develop measurements for evaluating the program or to provide technical assistance. We were advised, however, that plans are currently underway to reorganize ITAC. Additional staff is being acquired, and a draft ITAC operating manual has been developed which, among other things, establishes a planning, monitoring, and evaluation branch and a technical assistance branch.

RECOMMENDATIONS TO THE SECRETARY OF THE INTERIOR

The Secretary of the Interior should direct the Assistant Secretary for Indian Affairs to carry out the recommendations of BIA's management review team, and to make every effort to reorganize ITAC in the manner outlined in the draft operating manual, which includes a technical assistance branch and a planning, monitoring, and evaluation branch needed to evaluate the Indian Action Team program. Once the ITAC Chief has been selected, the Assistant Secretary should instruct him to:

--Establish, with the Indian contractors, measurements to evaluate the effectiveness of the Indian Action Team program.

--Modify the Indian contracts to reflect the measurement criteria established including reporting requirements.

--Require that Indian contractors be responsible for submitting the necessary reports to ITAC for evaluation purposes.

--Evaluate the Indian contractors' performance as soon as possible to identify those programs for which further contracts should not be negotiated.

--Evaluate proposed Indian Action Team programs and fund the most promising ones if, as a result of the contractor evaluations, funds become available.

--Review all Indian Action Team program contracts with the Indian contractors to determine if technical assistance may be needed and to provide such assistance.

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